



Weather Shield *Windows & Doors*

March 29, 2002

Department of Energy
ATTN: Richard H. Karney and David Garmon
Washington, DC 20585

Gentlemen:

After reviewing the latest proposals for the Energy Star climate zones, I find it imperative that I address several key areas of concern on behalf of Weather Shield Windows & Doors.

The main area of focus is the climate zone(s) being proposed for the northern region. The northern regional requirements reflect a 0.35 u-value and a SHGC of any value. The current Energy Star proposal already requires a very large region to meet these stringent u-values, but even more of a concern is that several of your proposals considerably extend that region even further.

Weather Shield Windows & Doors is strongly opposed to proposals #3 through #7. Each of these proposals extend the region requiring the 0.35 u-value requirement and will immensely affect the sales of our aluminum clad products which have been the product of choice for many of our customers in exactly these locations. In the higher elevations a consumer cannot even "reap" the energy value of argon gas because the units require capillary tubes. Even though Weather Shield offers a vinyl product line and a wood product line, many of our customers prefer the aluminum-clad wood products.

Weather Shield Windows & Doors became an Energy Star partner two years ago because we recognize the value of being able to offer customers an energy-efficient product that is nationally recognized. We do, however, also have to meet the desires of our consumers. With the newly proposed regions, it could very well result in Weather Shield withdrawing from the Energy Star labeling program completely. We have already discontinued labeling our products that do not meet all of the Energy Star regional requirements due to the confusion and skepticism it has caused our customers located in the northern climate zone.

A climate zone change reflection your proposals mentioned above for the northern zone will make it very difficult to market and sell our popular maintenance-free exterior aluminum clad products.

Weather Shield Windows & Doors wishes to express their support of the current proposal for the Energy Star climate zones and express opposition to all of the other proposals under review. Please consider this information when making your final decision.

I can be reached at (800) 222-2995, Extension 3908 or at vrogers@weathershield.com. Thank you for your consideration.

Regards,

Valerie Rogers
Testing & Certification Coordinator

VKR:vkr

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